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Monte Carlo Resort and Casino

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA NEGRELLI, an individual,

Case No. 2:15-cv-01840-GMN-NJK

Plaintiff,

V.

MGM RESORTS INTERNATIONAL, d/b/a
MONTE CARLO RESORT AND CASINO;
and CULINARY WORKERS UNION
LOCAL 226; and DOES 1-50, inclusive,

Defendants.

STIPULATION TO: (1) DISMISS DEFENDANT MGM RESORTS INTERNATIONAL WITH PREJUDICE; (2) CORRECT CAPTION AND NAME VICTORIA PARTNERS d/b/a MONTE CARLO RESORT AND CASINO AS DEFENDANT; AND, (3) EXTEND TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT

[First Request]

COMES NOW Defendants Victoria Partners d/b/a Monte Carlo Resort and Casino, improperly named as "MGM Resorts International, d/b/a Monte Carlo Resort and Casino" (hereinafter referred to as "Defendant"), Culinary Workers Union Local 226, and Plaintiff Lisa Negrelli (hereinafter referred to as "Plaintiff"), by and through their respective attorneys, as follows:

IT IS STIPULATED that the Defendant named as "MGM Resorts International d/b/a Monte Carlo Resort and Casino" shall be dismissed with prejudice from this action and shall be stricken from the caption.

IT IS FURTHER STIPULATED that Defendant “Victoria Partners d/b/a Monte Carlo Resort and Casino” shall be substituted as the Defendant and that the caption shall be revised to

1 reflect that "Victoria Partners d/b/a Monte Carlo Resort and Casino" is named employer
2 Defendant in the case.

3 IT IS FURTHER STIPULATED that Defendants Victoria Partners d/b/a Monte Carlo
4 Resort and Casino and Culinary Workers Union Local 226 shall have seven (7) days from the
5 date the Court enters this order to answer or otherwise respond to Plaintiff's Complaint.
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7 This stipulation is submitted and based upon the following:

8 1. No Defendants have answered or otherwise responded to Plaintiff's Complaint and
9 there is good cause for dismissing MGM Resorts International from this action;
10 2. There is good cause for correcting the caption and substituting Victoria Partners d/b/a
11 Monte Carlo Resort and Casino as the Defendant in this action;
12 3. That this is the first request to extend time for Defendant to answer or otherwise
13 respond to Plaintiff's Complaint and there is good cause for the request; and,
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1 4. That this request is made in good faith and not for the purpose of delay.

2 Dated: October 29, 2015

Dated: October 29, 2015

3 JACKSON LEWIS P.C.

SANTACROCE LAW OFFICES, LTD.

4 /s/ Paul T. Trimmer
5 Paul T. Trimmer
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9 *Attorneys for Defendant Victoria Partners*

10 /s/ Frederick A. Santacroce
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15 *Attorneys for Plaintiff*

16 McCracken Stemerman & Holsberry

17 /s/ Kristin L. Martin
18 Kristin L. Martin
19 1630 S. Commerce St., Suite A-1
20 Las Vegas, NV 89102

21 *Attorneys for Defendant Culinary Workers
22 Union Local 226*

23 **IT IS SO ORDERED. “MGM Resorts International d/b/a Monte Carlo Resort and Casino”**
24 **shall be dismissed with prejudice. The Clerk shall revise the caption in this action by**
25 **deleting “MGM Resorts International, d/b/a Monte Carlo Resort and Casino” and**
26 **replacing it with “Victoria Partners d/b/a Monte Carlo Resort and Casino.”**

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28 U.S. District Court Judge/U.S. Magistrate Judge

29 Dated: _____